

ORIGINAL

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

In the Matter of

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Advanced Television Systems
and Their Impact upon the
Existing Television Broadcast
Service

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MM Docket No. 87-268

NOV 22 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**COMMENTS OF
CHANNEL 2 BROADCASTING COMPANY**

Channel 2 Broadcasting Company ("Channel 2"), the licensee of Broadcast Station KTUU-TV, Channel 2, Anchorage, Alaska, hereby comments on the Commission's "Sixth Further Notice of Proposed Rulemaking" ("Sixth Further Notice") adopted on July 25, 1996 and released August 14, 1996 in the above-captioned proceeding. These Comments are timely by virtue of the fact that they are being filed with the Commission on or before November 22, 1996.

I. Introduction

1. KTUU-TV, formerly KENI-TV, has been on the air since 1953, providing important news, information and entertainment programming to the citizens of Anchorage and the surrounding service area. The station's longstanding devotion to local needs and issues has been complemented, on the national level, through the station's affiliation since 1955 with the NBC Television Network.

2. Channel 2 supports the Commission's Sixth Further Notice generally. It is committed to providing its viewers with the benefits of the highest broadcast technology available, including digital television service. However, Channel 2 and all Alaska television

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broadcasters are concerned about the extraordinary cost involved in making this new technology available and the likely long-term wait for a reasonable return on this investment. To moderate somewhat these risks, and following a strong public service tradition of cooperation, the Anchorage area television broadcasters have formed a tower committee to establish a single DTV transmission site which will accommodate all of the area Anchorage television stations. The public interest benefits are clear -- generation of cost-efficiencies, the elimination of the need for multiple transmission sites, uniform home antenna orientation, reduced FAA concerns and reduced local concerns about aesthetics and the environment. The formation of the tower committee is a constructive response to the Commission's Sixth Further Notice and the advent of DTV.

II. Discussion

3. In separate comments to be filed in this proceeding, the Alaska Broadcasters Association ("ABA") has proposed an alternative to the FCC's Table of DTV Allotments for Anchorage, Fairbanks and the North Pole. Pertinent to these comments is the ABA's proposal for Anchorage:

NTSC	FCC DTV	ABA DTV
2	51	18
4	23	20
5	21	22
7	16	24
9	15	26
11	14	28
13	17	30
33	32	32

Based on the engineering review conducted by the ABA, not only will the ABA's proposed DTV channels be able to operate without interference to current NTSC operations, they will also be able to operate from the same transmission site without causing unacceptable interference to each other.

4. The proposals contained in the ABA's Table reflect the type of input and cooperation that the Commission has encouraged in its Sixth Further Notice.^{1/} Channel 2 is particularly pleased with the ABA's Table proposal because it will provide KTUU-TV with DTV operational parity with the other FCC DTV allotments. For reasons which are not apparent from the face of the Sixth Further Notice, the Commission has proposed that Channel 2's DTV allotment be Channel 51 rather than a channel in close proximity to the other stations' DTV channels, i.e. 23, 21, 16, 15, 14, 17 and 32. Not only would the use of Channel 51 place KTUU-TV at a competitive disadvantage to the other area broadcasters, it could also jeopardize its very existence. At the current time, the station operates with 100,000 watts generated by a 30 kw transmitter. Power consumption averages approximately \$30,000 per year. Under the Commission's proposal, the station would have to generate 5,000,000 watts on Channel 51 on a continuous power basis, not on an average power basis. This would be equivalent to a 20,000,000 watt station. There is no transmitter known to exist for that power need. Even if there were, the cost of the station's power consumption could exceed \$1,000,000 per year by Channel 2's calculations. In a television market the size of Anchorage, it would not be feasible to operate a station in such circumstances.

5. Also, if the Commission were to require KTUU-TV's DTV operations to use

^{1/} Sixth Further Notice at paras. 44-49.

Channel 51, that would prevent the Anchorage area broadcasters from realizing an important goal, that is to co-locate all Anchorage station DTV transmission facilities at the same site. The DTV channels proposed by the Commission for the other broadcasters are grouped together from Channels 14 to 32 while the DTV allotment proposed for KTUU-TV is significantly higher at Channel 51. Broadband transmitter antennas typically do not cover the entire UHF band from 14 to 69. Accordingly, KTUU-TV would be forced to have a separate transmission site were it required to use Channel 51. There is a further reason why Channel 51 should be rejected. It has been demonstrated that receive antenna baluns perform poorly in the upper end of the UHF band. They can sometimes attenuate as much as 10 dB at Channel 51. In areas other than Grade A coverage, therefore, KTUU-TV could be faced with a total loss of signal at the home receiver. Because of the station's desire to serve remote areas well beyond Anchorage proper and the existence of frequent, very adverse weather conditions over large areas, use of Channel 51 by KTUU-TV is simply unacceptable from a public interest perspective.

III. Conclusion

As these Comments make clear, there are a multiplicity of additional considerations that must be taken into account in determining an appropriate TV Table of DTV allotments for Anchorage, Alaska. The ABA, with the help of the Anchorage full service television broadcasters, has developed a workable, sensible plan to serve numerous public interest benefits ranging from insuring reliable over-the-air DTV service to reducing concerns about air navigation and the environment. Accordingly, the Anchorage plan should be adopted forthwith in substitution for the FCC's proposed Table of DTV Allotments for Anchorage, Alaska.^{2/}

Respectfully submitted,

CHANNEL 2 BROADCASTING COMPANY

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^{2/} Channel 2 intends to provide the FCC with an executed statement in support of the ABA DTV Table proposal.